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VIA ECF FILING

Hon. H. Kenneth Schroeder, Jr.
United States Magistrate Judge
United States District Court – Western District of New York
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, New York 14202

***Re: Marcellin et al. v. HP, Inc. et al.
21-CV-704-JLS***

Dear Judge Schroeder:

I write on behalf of counsel for all parties to request entry of a Second Amended Scheduling Order extending discovery and other deadlines in the above-referenced action. A proposed Second Amended Scheduling Order containing the dates agreed to by all counsel is being filed herewith.

This is a wrongful death and personal injury products liability action stemming from a fire that plaintiffs claim originated in a laptop computer on January 24, 2020. The defendants deny liability. The initial document discovery was extensive due to the extremely technical nature of the subject matter of this case. One extension of the discovery and other deadlines in the initial Scheduling Order was requested and granted on November 17, 2022.

The need for additional document discovery arose in March following a change to plaintiff's allegations with respect to her purchase date of the laptop. The additional document discovery has required more time than previously anticipated. The parties are working through the additional discovery, including supplemental responses to previous requests, and have agreed to exchange it on or before June 30, 2023, and to conduct depositions of the plaintiffs on July 7, 2023 and of an HP, Inc. representative on August 2, 2023. The parties are confident we will complete discovery within the extended period requested.

Thank you in advance for your consideration of our joint request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jaclyn S. Wanemaker".

Jaclyn S. Wanemaker

cc: All counsel of record via ECF Filing System